

UNITED STATES COURT DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RICHARD BERGER, for himself and on behalf
of all others similarly situated,

Plaintiffs,

against

NEW YORK UNIVERSITY,

Defendants.

Civ. No. 19-CV-00267 (JPO)

DECLARATION OF SANDI F. DUBIN

SANDI F. DUBIN hereby declares as follows:

1. I am employed by New York University (“NYU”) as its Associate General Counsel & Director of Labor Relations. This declaration, which is submitted in support of NYU’s opposition to Plaintiff Richard Berger’s Motion to Remand in the above-captioned action, is based on my personal knowledge unless otherwise indicated.
2. Attached hereto as **Exhibit A** is a true and correct copy of the collective bargaining agreement (the “CBA”) between NYU and the Local One Securities Officers Union (the “Union”), dated May 20, 2013, as well as subsequent extensions of the CBA.
3. Attached hereto as **Exhibit B** is a true and correct copy of the Settlement Agreement entered into by a Union member, the Union, and NYU, dated September 10, 2010, resolving a grievance that was brought against NYU pursuant to the CBA’s Grievance Procedure. The names of any Union members have been redacted from this Exhibit.
4. Attached hereto as **Exhibit C** is a true and correct copy of the Settlement Agreement entered into by the Union and NYU, dated June 4, 2012, resolving a grievance that

was brought against NYU pursuant to the CBA's Grievance Procedure. The names of any Union members have been redacted from this Exhibit.

5. Attached hereto as **Exhibit D** is a true and correct copy of the Settlement Agreement entered into by the Union and NYU, dated June 4, 2012, resolving a grievance that was brought against NYU pursuant to the CBA's Grievance Procedure. The names of any Union members have been redacted from this Exhibit.

6. Attached hereto as **Exhibit E** is a true and correct copy of the Step 2 – Notice of Grievance, dated February 15, 2019, that was served by NYU on the Union in accordance with the CBA's Grievance Procedure.

7. Attached hereto as **Exhibit F** is a true and correct copy of the NYU's Demand For Arbitration that was served on Plaintiff by counsel for NYU on February 21, 2019, in accordance with the CBA's Grievance Procedure.

8. Attached hereto as **Exhibit G** is a true and correct copy of the NYU's Demand For Arbitration that was filed by NYU with the American Arbitration Association on March 6, 2019, in accordance with the CBA's Grievance Procedure.

I declare under penalty of perjury under the laws of the State of New York and the United States that the foregoing is true and correct.

Signature: Sandi F Dubin

Printed Name: SANDI F DUBIN

Date: 3/7/2019